

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JEREMY LEVIN and DR. LUCILLE LEVIN, :

Plaintiffs, :

-against- :

BANK OF NEW YORK, JPMORGAN :

CHASE, SOCIETE GENERALE and :

CITIBANK, :

Defendants. :

-----X

THE BANK OF NEW YORK MELLON, et al., :

Third-Party Plaintiffs, :

-against- :

STEVEN M. GREENBAUM, et al., :

Third-Party Defendants. :

-----X

THE BANK OF NEW YORK MELLON, et al., :

Third-Party Plaintiffs, :

-against- :

THE ESTATE OF JAMES SYLVIA and :

LYNNE MICHOLO SPENCER, et al., :

Third-Party Defendants. :

-----X

THE BANK OF NEW YORK MELLON, et al., :

Third-Party Plaintiffs, :

-against- :

Case No. 09 Civ. 5900 (RPP)
(MHD)

TO BE FILED UNDER SEAL

NOTICE OF CROSS-MOTION

ESTATE OF MICHAEL HEISER, et al., :

Third-Party Defendants. :

-----X

JPMORGAN CHASE BANK, N.A., :

Third-Party Plaintiff, :

-against- :

_____ :

Third-Party Defendants. :

-----X

CITIBANK, N.A., :

Third-Party Plaintiff, :

-against- :

_____ :

Third-Party Defendants. :

-----X

THE BANK OF NEW YORK MELLON, :

Third-Party Plaintiff, :

-against- :

_____ :

Third-Party Defendants. :


-----X

THE BANK OF NEW YORK MELLON, :

Third-Party Plaintiff, :

-against- :

_____ :

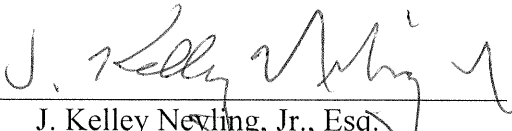
Third-Party Defendant.	:
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SOCIÉTÉ GÉNÉRALE,	:
Third-Party Plaintiff,	:
-against-	:
	:
Third-Party Defendants.	:
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PLEASE TAKE NOTICE that on June 21, 2011, at 11:00 A.M., or as soon thereafter as the parties may be heard, or on such other date and at such other time as the Court may specify, upon the accompanying declaration of J. Kelley Nevling, Jr., executed on June 17, 2011 (the “Nevling Declaration”), the exhibits thereto and all of the other declarations, affidavits, exhibits and documents heretofore filed in this proceeding by counsel for the moving parties, defendants JPMorgan & Co., JPMorgan Chase Bank, N.A. (together, “JPMorgan”) and The Bank of New York Mellon (“BNY Mellon”) (collectively, the “Cross-Moving Parties”) will move this Court, in Courtroom 24A of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10005, pursuant to Rules 22, 54 et al. of the Federal Rules of Procedure, section 134, subd. 6 of the New York Banking Law, sections 1006 and 5239 of the New York Civil Procedure Law and Rules and other applicable provisions and principles of federal and state law, in the event and to the extent that this Court determines to award any of the JPM Phase 1 Assets or the BNYM Phase 1 Assets (using those terms as they are defined in the Nevling Declaration) to the plaintiffs or any of the third-party defendants in these proceedings, for the entry of a judgment in the form of Exhibit A to the Nevling

Declaration, (1) discharging the Cross-Moving Parties from liability to other parties with respect to any of the JPM Phase 1 Asset or the BNYM Phase 1 Assets that may be awarded to any judgment creditor of the Islamic Republic of Iran, to the extent set forth in Exhibit A, (2) making provision for the award to the Cross-Moving Parties of the reasonable attorneys' fees and disbursements incurred by them in connection with the third-party proceedings for interpleader relief that they have commenced in connection with these proceedings, as set forth in Exhibit A, and (3) granting to JPMCB and BNY Mellon such other and further relief as may be just and proper.

Dated: New York, New York
June 17, 2011

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& Co., JPMorgan Chase Bank, N.A. and
The Bank of New York Mellon*